

BWB:ACG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

STEVE MARK LYKEN,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHELLE PANELLA, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

Upon information and belief, on or about October 20, 2015, within the Eastern District of New York and elsewhere, the defendant STEVE MARK LYKEN did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent’s information and belief are as follows:¹

1. On or about October 20, 2015, the defendant STEVE MARK LYKEN, along with his wife Chandra Lyken, arrived at John F. Kennedy International Airport

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

("JFK") in Queens, New York aboard Caribbean Airlines flight no. 526 from Georgetown, Guyana.

2. Upon his arrival at JFK, the defendant STEVE MARK LYKEN was selected for an enforcement examination by United States Customs and Border Protection ("CBP"). The defendant presented one black carry-on suitcase for inspection. The defendant acknowledged ownership of the bag and its contents. Upon emptying the contents of the defendant's bag, a CBP officer observed that the bag appeared heavy and that the bottom of the bag appeared thick. The lining of the bag was then removed, which revealed rectangular packages at the bottom of the bag. A CBP officer probed one of the packages and exposed a white, powdery substance. A field-test of the substance was positive for cocaine. The total approximate gross weight of the cocaine recovered from the bag was 3,823.3 grams.


3. After being placed under arrest, the defendant STEVE MARK LYKEN was advised of his Miranda rights by HSI agents. The defendant waived his rights and agreed to speak with law enforcement agents. The defendant stated, in sum and substance and in part, that he expected to be paid \$10,000 for bringing the bag, among other items, into the United States.

4. Similar packages were also recovered from the carry-on suitcase of the defendant's wife, Chandra Lyken. A field-test of the substance inside one of those packages was positive for cocaine. The total approximate gross weight of the cocaine recovered from her bag was 5,921.6 grams.


5. The total approximate gross weight of the cocaine recovered from the defendant STEVE MARK LYKEN and his wife was 9,744.9 grams.

WHEREFORE, your deponent respectfully requests that the defendant STEVE MARK LYKEN be dealt with according to law.

Dated: Brooklyn, New York
October 21, 2015


MICHELLE PANELLA
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
21st day of October, 2015


THE HONORABLE RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK